

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
SOUTHEASTERN DIVISION

JAMIE KAUFMANN WOODS,)	
et al.,)	
)	
Plaintiffs,)	
)	
vs.)	Case No.: 1:03CV00105 CAS
)	
BOB WILLS, et al.)	
)	
Defendants.)	

STIPULATED FACTS AND PROPOSED VOIR DIRE STATEMENT

On behalf of the parties, Defendants hereby submit the following stipulated facts and proposed voir dire statement:

A. Stipulated Facts.

1. Plaintiff Tracey Ozuna was enrolled by her parents at Mountain Park as a student on two occasions. The first occasion was between December 1995 and April 1996 and the second time was from February through December 1997. She was under the age of 18 both times.
2. Plaintiff Jessica Deboi was enrolled by her parents at Mountain Park between April and December 1997. She was under the age of 18 at the time.
3. Plaintiff Jamie Kaufmann Woods was enrolled by her parents at Mountain Park.
4. Ms. Woods was at Mountain Park from September 9, 1999 until May 2001.
5. Plaintiff Shari Lueken was enrolled at Mountain Park by her parents from June 23, 2000 until June 20, 2002.

6. Ms. Lueken was under the age of 18 while she was a student at Mountain Park.

7. Erika Teasley was enrolled by her mother at Mountain Park from January 18, 2003 until May 2003.

8. Ms. Teasley was under the age of 18 while at Mountain Park.

B. Voir Dire Statement

In 1987, Defendants Bob Wills and his wife, Betty Wills, established Mountain Park Baptist Church, or Mountain Park, in Patterson, Missouri, near Poplar Bluff. The mission of Mountain Park was to run a boarding school for teens.¹ Defendants Sam Gerhardt, Deborah Gerhardt, Julie Gerhardt, Andrea Hill and Sharon Goodman all were staff members.

In this case, five former students of Mountain Park, Jamie Kaufmann Woods, Shari Lueken, Erika Teasley, Tracey Ozuna and Jessica Deboi have made claims of negligence against the Defendants. Two of the former students also have a claim for battery against some of the defendants.

The Defendants all deny having committed any negligent acts or any acts of battery.

Respectfully submitted,

BROWN & JAMES, P.C.

/s/ John D. Briggs
Steven H. Schwartz, #4316
John D. Briggs, #86025
1010 Market Street, 20th floor
St. Louis, Missouri 63101
314-421-3400
314-421-3128 FAX
Attorneys for Defendants

¹ The parties do not agree on the use of this sentence. Plaintiffs propose that it be removed. Defendants propose that it be included in the statement.

CERTIFICATE OF SERVICE

I hereby certify that on November 22, 2005, the foregoing was filed electronically with the Clerk of Court to be served by operation of the Court's electronic filing system upon the following:

Mr. Oscar Stilley
7103 Racetrack Loop
Fort Smith, Arkansas 72916
Attorney for Plaintiffs

Oliver, Oliver & Waltz, P.C.
400 Broadway
Cape Girardeau, MO 63702
Attorneys for Co-Defendants

/s/ John D. Briggs

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